

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

Kamiesha L. Ball : NO. 17-15739 AMC

OBJECTION TO CERTIFICATE OF DEFAULT AND CERTIFICATE OF SERVICE

Debtor, by her counsel, objects to the certificate of default and request the Court not enter a relief order and to please hold a hearing due to the following:

1. Debtor paid up to date and they put her payments in un-applied funds.
2. Debtor fell behind because 72 members of her family have died since the start of the pandemic causing her to have an emotional break down and miss 2 months of work.

/s/ David M. Offen
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A copy of this Objection is being served on Denise Carlon, Esquire and the Chapter 13 Trustee.

/s/ David M. Offen
David M. Offen
Attorney for Debtor